

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT  
AND ARREST WARRANT**

**INTRODUCTION AND AGENT BACKGROUND**

I, Tadd Downs, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent of the United States Secret Service (USSS) and have been employed as such since March 3, 1996. I am currently assigned to the Missoula Domicile/Billings, Montana, office. I make this affidavit based on my personal knowledge and upon information received by me from other law enforcement officials.

2. This affidavit supports an application for an arrest warrant for **Daniel Rachell**. Based on the information below, I have probable cause to believe that **Daniel Rachell** committed a criminal offense by threatening the President and successors to the Presidency in violation of 18 U.S.C. § 871 (threats against President and successors to the Presidency) and 18 U.S.C. § 879 (threats against former Presidents and certain other persons) .

**FACTUAL BACKGROUND**

3. In conjunction with my official duties with the USSS, I was contacted by MG (full name withheld to protect privacy), who indicated

that Daniel Rachell had threatened to kill the President of the United States multiple times over the past 6 months and made veiled threats against the family of the President.

4. On 03/24/14 and 03/25/14, I interviewed MG. MG stated that he currently works for a non-profit organization called Valley Veterans Service Center, located in Hamilton, MT. MG said that **Daniel Rachell** also works with him at the center and that **Daniel Rachell** had threatened to kill President Obama, First Lady Michelle Obama, and the Obama children. **Daniel Rachell** is a veteran of the Gulf War, and MG believed the subject is suffering from Post-Traumatic Stress Disorder (PTSD). MG indicated that on various dates throughout the past several months **Daniel Rachell** had become verbally abusive and had threatened to kill MG because MG currently serves in the Montana National Guard. MG indicated that the subject stated that he wanted to “smash” MG’s “skull in.”

5. I questioned MG as to why he was coming forward now with this information and not when **Daniel Rachell** started to threaten the President. MG indicated that, since both he and **Daniel Rachell** are veterans, he did not want to betray **Daniel Rachell** by going to the

authorities. MG further explained that he first thought **Daniel Rachell** was just “blowing off steam” when he made the threats. However, MG indicated that recently **Daniel Rachell** has obtained a concealed weapons permit and started to carry a weapon, even while working. MG went on to explain that in the last “five or six weeks” **Daniel Rachell** has started a “downward spiral.” MG expressed that **Daniel Rachell**’s PTSD may be worsening and that he feels **Daniel Rachell** may try to assassinate the President.

6. MG said that he believes **Daniel Rachell** is delusional and that **Daniel Rachell** lives in an unknown location in Darby, MT. MG also indicated that **Daniel Rachell** had bragged about being arrested by the United States Secret Service in the past for previous threats against the President.

7. MG said that **Daniel Rachell** has stated he has located various spots around Hamilton, MT, in which to launch an attack against the President, should the President visit Hamilton, MT. **Daniel Rachell** has also stated to MG that he has enough ammunition to “kill everyone in Hamilton.” MG further indicated that **Daniel Rachell** has developed a plan wherein **Daniel Rachell** has identified a

bridge located on Highway 93, north of Hamilton, MT, where **Daniel Rachell** could launch an attack on a presidential motorcade. MG said that **Daniel Rachell** said he could place “IEDs” on the bridge to “blow-up the bridge” and kill police and Secret Service Agents. **Daniel Rachell** has stated to MG that he has trained his wife to be a “spotter” and to assist in the assassination attempt by “providing suppressive fire” while he relocates during the assassination attempt. **Daniel Rachell** went to “great lengths to explain how he has trained his wife on the rifle range, specifically the Whittacar Rifle Range, to shoot a rifle using a scope, to provide service as a spotter at a distance, or provide suppressive fire to relocate from one position to another in case his first attack triggers a response by police so he can relocate to another position.” **Daniel Rachell** has stated to MG that he intends on ambushing the President, Secret Service, or the National Guard and that he has “plotted positions in Hamilton” where he could use a sniper rifle out to 1,000 meters. **Daniel Rachell** further stated that he knows that 1,000 meters is outside the range of the Secret Service Counter Sniper Unit but that he has multiple scopes and rifles capable of shooting at that range.

8. According to MG, **Daniel Rachell** has also made veiled threats against the First Lady and the children of the President. MG stated that **Daniel Rachell** has said that “someone needs to kill Michelle and the kids to save the tax payers money because they fly around on Air Force One all the time.”

9. MG also indicated that **Daniel Rachell** is a racist and uses racial slurs toward the President and First Family. MG also said that **Daniel Rachell** owns large amounts of weapons and uses pawn shops in Hamilton, MT, to purchase and sell weapons.

10. MG also said that **Daniel Rachell's** rants regarding the President have become more severe and delusional in the last couple of months, and he finally decided to notify the board of directors for the Valley Veterans Center. MG stated that the board of directors, in response to the allegations, closed the Center, launched an investigation into the matter, and hired a law firm in Missoula, MT, to conduct the investigation. The law firm then hired Michelle Puiggari, a labor attorney, to investigate the incident. MG said that Puiggari advised him to contact the United States Secret Service.

11. MG further stated that he has received “a half a dozen” confidential complaints relating to **Daniel Rachell’s** treatment of veterans, none of which involve the subject threatening the life of the President. MG said that he has turned over these complaints to Puiggari. MG has said multiple times to me that he does not wish to see Daniel Rachell arrested but that he is concerned that he (Rachell) may attempt to harm the President.

12. MG, at the conclusion of the interview, indicated that I should use extreme caution when I attempt to contact or interview **Daniel Rachell**. MG said that he thought that **Daniel Rachell** may not cooperate and may attempt to harm anyone who tries to investigate this matter.

13. Continuing on 03/24/14, I interviewed Michelle Puiggari, concerning her investigation. Puiggari indicated that she is licensed to practice law in the state of New Mexico. She was currently employed by the law firm Datsopoulos, McDonald, and Lind in Missoula, MT, to investigate a complaint brought to the board of directors of the Valley Veterans Center. Puiggari stated that her investigation was strictly dealing with the employment issues brought forth by MG and that



when MG mentioned the threats to the President, she advised him to contact the USSS.

14. Puiggari stated that MG brought forth four employment allegations against **Daniel Rachell**. They are:

1. **Daniel Rachell** has made racist comments on several occasions;
2. **Daniel Rachell** has brought weapons to the Valley Veterans Center;
3. **Daniel Rachell** has treated veterans who visit the Center poorly; and
4. **Daniel Rachell** has threatened the life of MG.

15. Puiggari stated that her investigation has been able to independently substantiate three of the four allegations through corroborative statements by third parties. Puiggari stated she believes MG to be a credible witness and is recommending the termination of employment of **Daniel Rachell**.

16. On 03/24/14, I conducted an NCIC search for any criminal history and outstanding warrants for both MG and **Daniel Rachell**. The search yielded negative results.

17. On 03/24/14, a USSS records check indicated that **Daniel Rachell** is of record with the USSS under file number 127-671-40705. **Daniel Rachell** was investigated by the USSS from April of 2011 until July of 2011 for threats against the President.

18. On 03/25/14, I spoke with Captain Dave Potter, Ravalli County Sheriff's Office regarding **Daniel Rachell**. Capt. Potter was able to confirm MG statement that **Daniel Rachell** has a concealed weapons permit. This permit was issued in January of 2014. He was also able to confirm MG statement that Daniel Rachell purchases and sells guns to local pawn shops by locating two pawn slips where **Daniel Rachell** had sold guns to a pawn shop. Additionally, Capt. Potter was able to confirm that Daniel Rachell is a member of the Whittacar rifle range in Ravalli County, MT.

19. On 03/25/14, I asked MG if he would be willing to take a polygraph test concerning the threats made by **Daniel Rachell**. MG responded by saying, "absolutely."

20. On 03/25/14, I reviewed the USSS case referenced above in paragraph 17. A synopsis of how the case came to the attention of the USSS, and other information is listed below:



On 04/03/11, USSS SA Christopher Williams, reported that on 04/01/11, Fairview Heights, IL Police Department Detective Aaron Nyman, badge #171, contacted SA Williams and informed him that Fairview Heights resident MS, called the police department and reported that her ex-husband, **Daniel Rachell**, had been “stockpiling weapons” and was en route to Fairview Heights to kill her and **Daniel Rachell** other ex-wife, DR, who resides in St. Louis, MO.

Additionally, according to MS, **Daniel Rachell** had said he was going to kidnap his six (6) year old son, currently in the custody of DR. MS informed the police that **Daniel Rachell** had recently made threatening statements directed toward President Obama and anti-government statements, although she could not provide any specific information regarding the threats or statements.

MS further informed the police that **Daniel Rachell** was “unstable,” “physically abusive,” and was, by his own admission, suffering from PTSD. MS said **Daniel Rachell** had recently moved from Montana, and was currently

residing in San Antonio with their son, AR. **Daniel Rachell**, according to MS, was currently in possession of numerous firearms and a large amount of ammunition. The Fairview Heights Police Department contacted Illinois State law enforcement authorities, who, in turn, applied for and received authorization to electronically monitor **Daniel Rachell** cellular telephone location. The last known electronic "ping" from **Daniel Rachell** cellular telephone on 04/04/11 indicated that **Daniel Rachell** was in the Schertz, TX area, a suburb of San Antonio.

Upon receipt of the above information, agents of the San Antonio Field Office located and interviewed **Daniel Rachell**. After the interview, **Daniel Rachell** was taken to the Bluebonnet Trails MHMR Facility for a mental evaluation. Dr. John Rasch, due to the number of people claiming the subject had made threats directed toward President Obama and others, the fact that Daniel Rachell was in possession of firearms, had access to a vehicle, and that Daniel Rachell admitted to suffering from depression,

PTSD, and having recent suicidal ideations, that Daniel Rachell needed to be involuntarily admitted for further psychiatric evaluation.

The results of the psychiatric evaluation (summarized) was that **Daniel Rachell** has suggested elements of inflated self-esteem, and grandiosity or expansiveness. **Daniel Rachell** suffered from depression but did not display any psychotic symptoms while under observation at that time. It was determined that **Daniel Rachell** was suffering from PTSD and Major Depression, mild recurrent.

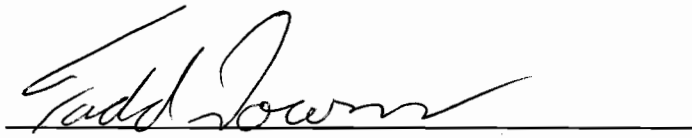
Throughout the above-referenced investigation **Daniel Rachell** denied making any threats toward the President of the United States.

### CONCLUSION

21. Based on the fact that Daniel Rachell made threatening statements toward the President in 2011, the specificity and details of his current attack plan, the frequency and duration of the threats, his racist comments, his access to weapons, and training with those weapons, the government requests that this Court issue an arrest

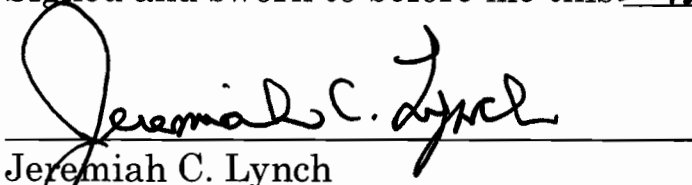
warrant for **Daniel Rachell** for violation of 18 U.S.C. § 871 (threats against President and successors to the Presidency) and 18 U.S.C. § 879 (threats against former Presidents and certain other persons).

FURTHER AFFIANT SAYETH NOT.

A handwritten signature in black ink, appearing to read "Tadd Downs", written over a horizontal line.

Tadd Downs  
Special Agent, U.S. Secret Service

Signed and sworn to before me this 28th day of March, 2014.

A handwritten signature in black ink, appearing to read "Jeremiah C. Lynch", written over a horizontal line.

Jeremiah C. Lynch  
United States Magistrate Judge